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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY RODRIGUEZ,

Defendant.

CASE NO. 1:20-CR-00236-NONE

STIPULATION TO CONTINUE SENTENCING
DATE; ORDER

DATE: September 24, 2021

TIME: 8:30 a.m.

COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on September 24, 2021.
2. By this stipulation, defendant now moves to continue the sentencing until November 19, 2021. As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes voluminous jail phone calls, as well as additional electronic evidence only recently discovered as part of a different related investigation. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time to review the jail calls and the new electronic evidence in order to prepare for sentencing.

c) Counsel for defendant has also been diligently seeking juvenile and military records related to defendant and vital at sentencing, but has found these materials extremely difficult to obtain.

d) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: July 16, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ LAURA D. WITHERS
LAURA D. WITHERS
Assistant United States Attorney

Dated: July 16, 2021

/s/ MEGHAN D. McLOUGHLIN
MEGHAN D. McLOUGHLIN
Counsel for Defendant
ANTHONY RODRIGUEZ

FINDINGS AND ORDER

IT IS SO ORDERED.

Dated: July 16, 2021

Dale A. Ingo
UNITED STATES DISTRICT JUDGE